

**Administrative Determination (AD)**  
**Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)**  
U.S. Department of the Interior - Bureau of Land Management  
Anchorage Field Office

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**A. BLM Office:** Anchorage Field Office

**Case File No.:** AA-085584

**Proposed Action Title/Type:** Drilling at Donlin Creek, 2920 Permit

**Location of Proposed Action:**

Seward Meridian

T. 20 N., R. 50 W., Section 22, 23, 24, 25, and 26 (Target 3);

T. 21 N., R. 50 W., Section 22, 26, and 27 (Target 1);

T. 22 N., R. 49 W., Section 20 (Target 2).

**Description of the Proposed Action:**

Placer Dome U.S., Inc. proposes to drill samples for a sand and aggregate assessment. The proposal, as described in the application, provides initial assessment of aggregate borrow material sites for the construction of the proposed Donlin Creek project. Results will provide information of the amount of cover, adequacy of material, and estimated resource.

Three areas (Targets 1-3) have been initially proposed for drilling. Target 1 would involve eleven drill holes; Target 2 would involve seven drill holes; and Target 3 would involve ten drill holes. The drill holes would be 2-3 inches in diameter, by 20-30 feet deep and not penetrate bedrock. See Exhibit A to view Target areas.

Drilling would be done dry, meaning no drill mud would be required. The auger used for drilling would be sling-loaded to the sites via helicopter. The auger weighs five hundred pounds, with base dimensions of 2 feet x 5 feet. A level spot of only 5 x 10 feet would be required. With these small dimensions, even in steep terrain, no drill pads or clearing would be necessary. The auger holds approximately five gallons of fuel. Additional fuel, if required, would be carried in standard five gallon fuel cans. No fuel would be stored on site. A spill response kit would accompany the drill on site.

The crews that would be doing the drilling would be flown in directly from Donlin Camp. Occasional reconnaissance flights to evaluate the geology would be conducted and may involve flying over various outcrops. Occasional short hops between field sites may occur. Flight patterns would be flown in a way to minimize the time in the air.

Results from the drilling of the three proposed target areas may lead to a need to drill other sites in the vicinity. If new sites would be necessary, the applicant would need to

notify BLM, identify the new locations and any other changes to the Proposed Action, and apply for a new authorization to proceed.

**Applicant (if any):** Placer Dome U.S., Inc.

**B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans:**

The Proposed Action has been reviewed and found to be in compliance with the Southwest Planning Area Management Framework Plan (MFP), signed November 1981. The Southwest MFP Lands Objective, L-2, states the BLM will “meet the demand for private entry on public land.”

**C. Identify applicable NEPA documents and other related documents that cover the Proposed Action.**

Environmental Assessment AK-040-04-EA-010, December 2003; 2920 Permit Application, Placer Dome U.S. Inc., Donlin Creek Project Area, 06/03/04; Correspondences from James Fuego to Natalie Cooper, dated 06/03/04 and 06/15/04.

The Proposed Action is nearly identical to the Proposed Action described in AK-040-04-EA-010. This EA addressed the Placer Dome U.S. Inc. proposal to drill on public lands in the Donlin Creek Prospect area located in T. 22 N., Rngs. 48 and 49 W. which analyze potential areas to place tailings from the proposed Donlin Creek Gold Mine. The FONSI/Decision Record was signed on December 19, 2003. The drilling analyzed under this EA occurred one and a half to thirteen miles north east of the proposed drilling locations for this sand and aggregate assessment. The impacts of this proposed action are to be less than those of the proposed actions of AK-040-04-EA-010.

**D. NEPA Adequacy Criteria**

**1. Is the current Proposed Action substantially the same action (or is a part of that action) as previously analyzed? Is the current Proposed Action located at a site specifically analyzed in an existing document?**

The Proposed Action is essentially the same as a part of the proposed action as outlined within AK-040-04-EA-010. The proposed action of the EA accounted for brush cutting along survey lines and roads, drill holes six inches in diameter/one thousand feet deep, and drilling mud. This proposed action involves no survey lines and roads, and dry drilling of holes of less diameter and depth. The location of the current Proposed Action is in the same and nearly adjacent Township and Range as outlined in the aforementioned EA.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current Proposed Action, given current environmental concerns, interests, and resource values?**

The Proposed Action in the referenced EA was to allow the drilling of monitoring wells for the accurate assessment of water flow and quality, and groundwater influence design on possible mining facilities. In addition, the drilling of condemnation holes was to assist in locating potential sites for mine waste rock, tailing deposition, and construction of mill and maintenance facilities related to the analysis of a mine operation on adjacent private lands. The only alternative analyzed was the No Action Alternative. The environmental issues and concerns from seven months ago, when the EA was signed, have not changed, therefore the alternative analyzed in the EA is appropriate with this Proposed Action.

**3. Is the existing analysis valid in light of any new information or circumstances?**

Yes. The following critical elements have been analyzed and will not be affected:

- Air Quality
- Areas of Critical Environmental Concern
- Environmental Justice
- Farmlands (Prime or Unique)
- Floodplains
- Native American Religious Concerns
- Wastes (Hazardous or Solid)
- Water Quality (Drinking or Ground)
- Wetlands/Riparian Zones
- Wild and Scenic Rivers
- Wilderness

Cultural Resources; Invasive Non-Native Species; T&E Species; and Subsistence have all been analyzed and will not be affected.

**4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current Proposed Action?**

Yes. The level of potential impact to certain resources of the existing NEPA document is less than the potential impacts of the current proposed action, however, the general concerns for BLM resources with this type of action, are the same concerns that were raised for the type of action in the existing NEPA document. The concerns of the proposed action in the existing NEPA document were to the following resources: visual impacts with vegetation clearances; water quality with drill muds and potential sediment from erosion along new roads and drill pads; threatened and endangered species with possibility to disturb habitat; and cultural resources with surface disturbances. Again, the potential impact of the existing NEPA document is greater than the potential impact for the current

proposed action, since there will be no vegetation clearances, drill mud, roads, and drill pads, but the resources we are concerned with are the same. With the similar concerns over resources, the analytical approaches to both of these proposed actions are the same.

**5. Are the direct and indirect impacts of the current Proposed Action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current Proposed Action?**

The direct and indirect impacts identified in the referenced EA are more than those anticipated for the Proposed Action. The setting, affected resources, and location are so similar, that the existing EA provides a reasonable basis for making a decision on the Proposed Action.

**6. Are the cumulative impacts that would result from implementation of the current Proposed Action substantially unchanged from those analyzed in the existing NEPA document(s)?**

Yes. The cumulative impacts of the current Proposed Action are similar to those analyzed in the existing NEPA document because both are considering the effects on the landscape, such as, long term loss of vegetation, wildlife habitat and changes to the riparian valley due to the possible construction of ancillary facilities, such as, roads and maintenance buildings.

**7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current Proposed Action?**

No public involvement and interagency review was associated with the existing EA. No public involvement and interagency review is necessary for this Proposed Action. The current land status describes the lands to be selected by the Calista Corporation and the State of Alaska. Placer Dome U.S., Inc. is working closely with Calista Corporation on the projects in the Donlin Creek Area. State 906(k) concurrence falls under a blanket concurrence of generally allowed uses; one being the prospecting via power drill or auger.

**E. Interdisciplinary Analysis:**

See the NEPA routing sheet.

**F. Conclusion**

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the Proposed Action and constitutes BLM's compliance with the requirements of NEPA.

/s/ Clinton E. Hanson, Acting  
Anchorage Field Manager

08-12-04  
Date